

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Application by Verizon Pennsylvania, Inc.,)	
Verizon Long Distance, Verizon Enterprise)	
Solutions, Verizon Global Networks, Inc.,)	CC Docket No. 01-138
And Verizon Select Services, Inc.)	
For Authorization to Provide In-Region,)	
InterLATA Services in Pennsylvania.)	

REPLY COMMENTS
REGARDING APPLICATION BY VERIZON PENNSYLVANIA, INC.
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN PENNSYLVANIA

SUBMITTED BY

Keep America Connected
National Association of Commissions for Women
National Association of Community Action Agencies
National Black Chamber of Commerce
National Grange of the Order of Patrons of Husbandry
National Indian Education Association
National Trust for the Development of African American Men

August 6, 2001

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The undersigned public interest, minority and consumer organizations hereby support the Application by Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services, Inc., (hereinafter referred to as Verizon) filing requesting FCC authorization to provide in-region, interLATA services in Pennsylvania. We reiterate our support as first articulated in our July 11 comments. We urge the Commission to undertake an expeditious review and approval of Verizon's 271 application.

We are brought together in our support for Verizon's Pennsylvania 271 application as being in the public interest and of real benefit to telecommunications consumers in the State of Pennsylvania. The primary goal of the Telecommunications Act of 1996 is to promote competition in the telecommunications marketplace. Verizon has demonstrated that it has met the tests of the Act and its entry as a long distance competitor will open the floodgates of competition in Pennsylvania.

I. Statement of Interests

Keep America Connected! (KAC) is an organization comprised of groups whose demonstrated goals involve promoting a variety of telecommunications issues. The primary goal of KAC is that regardless of income, race, disability, age, ethnicity or geographical location, affordable access to the use of the modern telecommunications infrastructure and services should be available. This goal is best achieved through the rapid development of a fully competitive marketplace that ensures that consumers across the nation will have access to more services at lower prices.

National Association of Commissions for Women (NACW) represents local commissions established to promote the interests of women in cultural, social, and

economic fields. NACW supports policies and programs that empower women to make informed choices about all aspects of their lives. NACW has been active in the debate on telecommunications reform, supporting legislative and regulatory initiatives to encourage competition, thereby creating new options and services for women as consumers and in their businesses.

National Association of Community Action Agencies (NACAA) serves as a national forum for policy on poverty and to strengthen, promote, represent and serve its network of member agencies to assure that the issues of the poor are effectively heard and addressed. NACAA advances the economic condition, educational attainment, political influence, health and civil rights of low-income Americans through community-based programs operating at more than 900 Community Action Agencies nationwide. It is NACAA's mission to ensure that low-income Americans are not left behind.

National Black Chamber of Commerce (NBCC) is dedicated to economically empowering and sustaining African American communities through entrepreneurship and capitalistic activity within the United States and via interaction with the Black Diaspora. This business association represents 64,000 Black owned businesses and provides an advocacy that reaches all 640,000 Black owned businesses. NBCC supports legislative and regulatory initiatives that encourage competition, thereby creating additional options for businesses.

National Grange of the Order of Patrons of Husbandry is the nation's oldest general agricultural organization, founded in 1867. It has grassroots units in 3,600 local communities in 37 states, with nearly 300,000 members. Its activities include and serve farm and non-farm, rural families and communities on a wide variety of economic,

educational, legislative and family issues. National Grange is a genuine grassroots, bipartisan, political advocacy organization. Through its unique resolution system, the Grange reflects the needs and desires of rural communities across the country. Granges participate in the political process at the local, state, and federal level, with direction emanating from the local level. The goal of Grange advocacy is the well-being and prosperity of rural America.

National Indian Education Association (NIEA) supports traditional Native cultures and values, to enable Native learners to become contributing members of their communities, to promote Native control of educational institutions, and to improve educational opportunities and resources for American Indians, Alaska Natives, and Native Hawaiian's throughout the United States NIEA has promoted the interests of Native Americans in telecommunications to Congress, before the FCC and in the courts.

National Trust for the Development of African American Men works to ensure the success of African-Americans especially males through economic and political empowerment by the use and development of our communities, resources, and collected skills (such as organizational and leadership) and by an understanding and a reawakening of our history, culture, and value. To accomplish this mission, The Trust has identified strategic goals that support the organization's efforts to further the empowerment of the African American community at the public and private sectors level, and enhance the image of the African American community.

II. Comments

The Commenters understand that the Department of Justice (DOJ) has filed its Written Evaluation of Verizon's Pennsylvania application with the Commission. The

DOJ stated that they are “unable to fully endorse Verizon’s application...”¹ The DOJ’s evaluation explained that they are unable to fully endorse Verizon’s application because of problems with Verizon’s electronic billing. Even so, the DOJ stated that Verizon submitted its application with the FCC “before sufficient time had elapsed to determine whether Verizon’s proposed fixes to these problems will be.”²

The Commenters believe the Verizon application should be approved on its merits as endorsed by the Pennsylvania PUC; however, we realize that the Commission must review and consider the DOJ’s evaluation on Verizon’s filing. Verizon and the Pennsylvania PUC have worked diligently through extensive testing and evaluation to ensure that Pennsylvania is open to competition and that Verizon has met the requirements to provide long distance services throughout the State of Pennsylvania. The work of Verizon in New York demonstrates its commitment to meet the letter and spirit of the Telecommunications Act of 1996. This application should not be denied due to technical considerations, especially when the DOJ states that there has been significant competitive entry in the Pennsylvania local telecommunications market.

The Commenters urge the Commission to approve Verizon’s Pennsylvania 271 application. The denial of Verizon’s application is not in the public interest and will delay, by a considerable period of time, the entry of a new and major competitor for long distance services in Pennsylvania.

The Commenters understand and appreciate the Commission’s role in carefully examining this application, but the Commission should not use this process to inhibit competition in this dynamically changing marketplace. By doing so, the benefits of

¹ Evaluation of the United States Department of Justice, CC Docket No. 01-138, July 26, 2001, p.1.

² Id.

increased competition and choice for all telecommunications consumers will not be realized.

III. Conclusion

The Commenters again assert that Verizon's Pennsylvania long distance application should be approved. The Pennsylvania PUC has stated that all of the requirements to provide long distance service have been met. Verizon has further publicly committed to resolve or demonstrate that the concerns presented by the DOJ have been resolved. The Commission's denial of this application would be a set back to the goals of the 1996 Act and will result in consumers not receiving the benefits of competition that the Act envisioned. The Commission must look at the pro-competitive benefits of Verizon's Pennsylvania long distance application and quickly approve it. Pennsylvania's consumers deserve competitive service at affordable rates.

Respectfully submitted,



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